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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Chapter 11
	)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-10943 (MEW)
	)	
Debtors.	)	(Jointly Administered)
_____	)	

**NOTICE OF PRESENTMENT AND OPPORTUNITY  
FOR HEARING ON STIPULATION AND AGREED  
ORDER EXTENDING GOVERNMENTAL BAR DATE FOR THE STATES**

**PLEASE TAKE NOTICE** that the National Association of Attorneys General (“NAAG”) on behalf of its member states in the United States (collectively, the “States”), the Texas Department of Banking and the Texas State Securities Board State, and the above-captioned debtors and debtors in possession (collectively, the “Debtors”) will present the *Stipulation and Agreed Order Extending Governmental Bar Date for the States*, attached hereto as **Exhibit A** (the “Stipulation and Order”), to the Honorable Michael E. Wiles, United States Bankruptcy Judge, for approval and signature on **January 6, 2023, at 12:00 p.m., prevailing Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the relief

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

requested in the Stipulation and Order shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of *In re Voyager Digital Holdings, Inc.*, No. 22-10943 (MEW) by registered users of the Court's electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court's website at <http://www.nysb.uscourts.gov>); and (d) be served in accordance with the *Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief* [Docket No. 240] by **January 3, 2023, at 4:00 p.m., prevailing Eastern Time**, by (i) the entities on the Master Service List available on the case website of the Debtors at <https://cases.stretto.com/voyager> and (ii) any person or entity with a particularized interest in the subject matter of the Stipulation and Order.

**PLEASE TAKE FURTHER NOTICE** that if no objections or other responses are timely filed and served by the Objection Deadline with respect to the Stipulation and Order, the Debtors shall, on the Presentment Date, submit the Stipulation and Order to the Court, which order the Court may enter without further notice or opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

**PLEASE TAKE FURTHER NOTICE** that copies of the Stipulation and Order and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Voyager>. You may also obtain copies of the Stipulation and Order and other pleadings filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

*[Remainder of page intentionally left blank.]*

Dated: December 28, 2022  
New York, New York

/s/ Joshua A. Sussberg

**KIRKLAND & ELLIS LLP**

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*Counsel to the Debtors and Debtors in Possession*

**Exhibit A**

**Proposed Stipulation and Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,<sup>2</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 22-10943 (MEW)  
)  
) (Jointly Administered)  
)

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**STIPULATION AND AGREED ORDER  
EXTENDING GOVERNMENTAL BAR DATE FOR THE STATES**

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**WHEREAS**, on July 5, 2022 (the “Petition Date”), each Debtor filed a voluntary petition for relief under chapter 11 of title 11 (as amended, the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”);

**WHEREAS**, by Order dated August 3, 2022, [Docket No. 218] (the “Bar Date Order”), the Court set January 3, 2023 (the “Governmental Bar Date”) as the deadline by which a governmental unit, as defined in section 101(27) of the Bankruptcy Code, must file proofs of claim in these chapter 11 cases.

**WHEREAS**, all states are governmental units (collectively, the “States”) within the meaning of section 101(27) of the Bankruptcy Code.

**WHEREAS**, the Parties have agreed, subject to the approval of the Bankruptcy Court, to an extension of the Governmental Bar Date for the States.

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<sup>2</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

Based on the foregoing stipulation of the parties, it is ORDERED that:

1. The Government Bar Date for the States shall be January 17, 2023, or such later date as may be ordered by the Court, without prejudice to the States' rights to seek further extensions of the date.

IT IS SO ORDERED.

New York, New York

Dated: \_\_\_\_\_, 2022

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THE HONORABLE MICHAEL E. WILES  
UNITED STATES BANKRUPTCY JUDGE

**AGREED TO BY:**

By: /s/ Karen Cordry  
Karen Cordry  
Bankruptcy Counsel  
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**AGREED TO BY:**

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Banking and the Texas State Securities  
Board*

**AGREED TO BY:**

By: /s/ Joshua A. Sussberg  
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**INTERNATIONAL LLP**  
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